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April 24, 2020

## **VIA CM/ECF FILING:**

The Honorable Lorna G. Schofield United States District Judge United States District Court for the Southern District of New York Thurgood Marshall United States Courthouse 40 Foley Square New York, New York 10007

Harold Ford v. WSP USA Inc., Case No. 19 Civ. 11705 (LGS) - Unopposed Request

for Adjournment of Hearing and Extension

## Dear Judge Schofield:

Re:

This matter is set for an initial pretrial conference on April 30, 2020 at 2:15 p.m. [Dkt. No. 22]. Further, Plaintiff's response to Defendant's letter regarding its planned motion to transfer venue is due on April 27, 2020. Plaintiff requests the Court adjourn the initial pretrial conference and letter response for two weeks so the Parties can continue settlement negotiations. This is Plaintiff's Counsel's first request for an adjournment of the initial conference, and second request for an extension of the response deadline. Plaintiff's Counsel's first request for an extension of the response deadline was granted.

The data necessary for damage calculations has been outsourced to an agreed third-party data entry company. Plaintiff understands this data will be ready next week. The plan is for the Parties to share a damage model and negotiate a settlement in good faith. The two week extension will allow the Parties to focus on these negotiations and further judicial economy. Plaintiff's Counsel conferred with Defendant's Counsel who is unopposed to the requested relief.

Sincerely,

/s/ *Dana M. Cimera*Dana M. Cimera

Application GRANTED. The initial pretrial conference, scheduled for April 30, 2020, is ADJOURNED to May 14, 2020, at 10:40 a.m.

Dated: April 27, 2020

New York, New York

LORNA G. SCHOFIELD

UNITED STATES DISTRICT JUDGE